

**To:** Russ, Timothy[Russ.Tim@epa.gov]  
**From:** Russ, Timothy  
**Sent:** Thur 1/15/2015 8:12:36 PM  
**Subject:** FW: WY Minor Source Permits and State Language - General Conformity; Re: CAA section 110(l)  
[13400ana.pdf](#)  
[13400offset.pdf](#)  
[13400per.pdf](#)  
[13194ana.pdf](#)  
[13194offset.pdf](#)  
[13194per.pdf](#)

**From:** Russ, Timothy  
**Sent:** Wednesday, March 13, 2013 12:03 PM  
**To:** Laumann, Sara  
**Subject:** WY Minor Source Permits and State Language; Re: CAA section 110(l)

Hi Sara,

## Ex. 5 - Deliberative Process

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**Ex. 5 - Deliberative Process** As noted below, Cole Andeson (WYDEQ) provided two examples of Encana permits which I have attached (see: 13400ana.pdf for the permit itself; 13400offset.pdf for the offset spreadsheets; and 13400per.pdf for the public information on the permit. Information for the second permit - 13194 – follows the same sequence). The pertinent language that is contained in both permits is found on page 6 of permit 13400ana.pdf (and on page 5 of permit 13194ana.pdf) which states:

**“CHAPTER 6, SECTION 2(c)(ii) DEMONSTRATION:** Under the Wyoming Air Quality Standards and Regulations (WAQSR), applicants for permits are required to demonstrate to the Administrator of the Air Quality Division (AQD), that “the proposed facility will not prevent the attainment or maintenance of any ambient air quality standard.” [WAQSR Chapter 6, Section 2(c)(ii)].

Options for the Chapter 6, Section 2(c)(ii) Demonstration include:

- a. Ambient ozone modeling for any application requesting increases in VOCs and/or NOx emissions.
- b. Emission reductions for VOCs and/or NOX emissions.
- c. Applicants may propose alternate innovative Demonstrations to the AQD.

A Chapter 6, Section 2(c)(ii) demonstration in accordance with the Division's Interim Policy has been conducted. Emission offset requirements, if applicable, have been applied to this permitting action at a ratio of 1.5:1.0 for VOCs and 1.1:1.0 for NOx.

EnCana has chosen to offset VOC emissions by consolidating previously uncontrolled wells into Central Facilities and controlling previously uncontrolled equipment at existing facilities that are being modified under current permitting actions. EnCana has chosen to offset NOX emissions by reducing emissions associated with their drill rig fleet. Permit conditions have been established to make the commitments to control emissions federally enforceable."

Please let me know if you have any questions and thanks for reviewing the materials.

Tim

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----- Forwarded by Carl Daly/R8/USEPA/US on 11/08/2012 04:18 PM -----

From: Cole Anderson <[cole.anderson@wyo.gov](mailto:cole.anderson@wyo.gov)>  
To: Carl Daly/R8/USEPA/US@EPA  
Cc: Steve Dietrich <[steve.dietrich@wyo.gov](mailto:steve.dietrich@wyo.gov)>, Tina Anderson <[tina.anderson@wyo.gov](mailto:tina.anderson@wyo.gov)>  
Date: 11/08/2012 03:21 PM  
Subject: Re: 2 Questions on General Conformity

Carl,

Attached are the permit examples Tina referenced in her last email. Two documents, 13400ana.pdf and 13194ana.pdf, are final analyses that were drafted for oil and gas sites in the non-attainment area. We organize our analyses (a.k.a. statement of basis) to address the proposed project and applicable regulations in the beginning. Next we list our proposed permit conditions. Finally, we include emissions tables and a table showing the offset calculation for the proposed project,

Also attached to the email are electronic versions of spreadsheets that we generate for each application. The spreadsheet is one large table of all permitting actions for the company that involve offsets. This spreadsheet and the Division's analysis are published for public comment. No comments were received on these two applications. Final permits for both applications were issued on July 24, 2012. Electronic copies of the final permits are attached.

If you have any questions, please don't hesitate to contact me.

Best regards,

Cole Anderson  
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**On Thu, Nov 8, 2012 at 10:36 AM, Tina Anderson <[tina.anderson@wyo.gov](mailto:tina.anderson@wyo.gov)> wrote:**

Carl,

You called Steve and I yesterday with a couple of followup questions from our general conformity meeting. Cole Anderson is pulling up some permit examples that you requested and we will forward those to you soon. In response to your other question regarding a remark by BLM about emissions associated with APDs, we can tell you that the estimate probably should have been expressed as hundreds of tons not thousands. Furthermore, the estimate is high largely because of mobile sources (such as haul trucks and vehicle traffic etc.) and the non-road component (drill engines, fracking engines, completion engines etc.). As you know, we don't regulate either mobile category through permitting so these are generally numbers not accounted for in a minor source permit. General Conformity, however, requires that the Federal Agency look at all emissions associated with a well pad, so those estimates are higher than what you see in a permit. The permits continue to be minor source permits. The permits will sometimes include the drill rig emissions if the company has volunteered to submit to that process, but even those controlled scenarios are handled through minor source permits. Nevertheless, the federal agency is still left with the problem of emissions over the de minimus for individual APDs, and the degree to which those emissions are over is largely dependent upon whether the Federal agency can exclude the permitted portion. I hope this addresses your concern. Please feel free to call Steve, or myself if you have further questions. Many thanks to you and Kate and Tim for making the trip up to Cheyenne.

Tina

Christine (Tina) Anderson

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